

FEDERAL PUBLIC DEFENDER

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July 17, 2014

Hon. Nathaneal M. Cousins
United States Magistrate Judge
Northern District of California
450 Golden Gate Ave.
San Francisco, CA 94102

Re: CR 14-90532 misc NC

Dear Judge Cousins,

By order filed July 9, 2014, you ordered filed publicly the government's letter brief in support of its under-seal applications for historical cell site information and invited the Federal Public Defender to respond to its arguments by July 28, 2014. The Federal Public Defender is preparing its response. To have a factual context in which to address the government's arguments, I asked AUSA Damali Taylor to provide a redacted copy of the application or to let me know what information the application sought and for what time period. AUSA Taylor declined to provide this information.

Accordingly, I am asking the Court for a redacted copy of the government applications for historical cell site information or, alternatively, for disclosure of the nature of the information requested in those applications and the time period (number of days, weeks, or months) they cover.

Very Truly Yours,
STEVEN G. KALAR
Federal Public Defender

/s/

ELLEN V. LEONIDA
Assistant Federal Public Defender